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February 13, 2024

Hon. Paul A Crotty
United States District Judge
500 Pearl Street
New York, NY 10007

Re: United States v. Santiago, et. al, 23 Cr 257 (PAC)

Dear Judge Crotty:

I am defense counsel for Anthony Bonilla. Anthony Cecutti and Kestine Thiel represent Jose Santiago, and Amy Gallicchio represents Angelo Palencia. All three defendants are scheduled to appear for a status conference tomorrow.

After consultation with Mr. Cecutti and Ms. Gallicchio, I submit this letter motion on behalf of all three defendants to seek an adjournment of tomorrow's conference for a period of not more than sixty days. The basis for the request is that Mr. Cecutti and Ms. Thiel are on trial and would not be able to appear tomorrow. Also, all three defendants are continuing to review discovery and are engaged in plea negotiations. We expect dispositions for all three defendants.

The parties respectfully request that time be excluded from February 14, 2024, until the new conference date under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), to permit the parties to continue discussing a potential pretrial disposition of the case and allow the defense additional time to review discovery materials.

Assistant United States Attorney Andrew Jones me that he would consent to an adjournment, but not for more than sixty days.

Sincerely,



Donald J. Yannella, Esq.

2/22/2024

A conference is scheduled to take place on Tuesday, April 16, 2024 at noon. Time will be excluded through April 16, 2024. SO ORDERED.